

FILED
Clerk
District Court

SEP 29 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE**
12 **NORTHERN MARIANA ISLANDS**

13 **ABELLANOSA, JOANNA, et al.,**

14 **Plaintiffs,**

15 **v.**

16 **L&T INTERNATIONAL**
17 **CORPORATION,**

18 **Defendant.**

Civil Action No. 05-0010

SUPPLEMENTAL RULE 56(f)
AFFIDAVIT OF JOE HILL

19 I, JOE HILL, hereby declare as follows:

- 20 1. I am counsel for the 76 Plaintiffs in the above-entitled action.
- 21 2. I am over the age of eighteen years old, have personal knowledge of the facts set forth
- 22 herein, am competent to testify as to these facts if called as a witness in a court of law, and if called
- 23 would testify as stated herein.
- 24 3. I have filed a Verified Opposition in this matter on behalf of Plaintiffs.
- 25 4. On September 23, 2006 I participated, as counsel for Plaintiffs, telephonically in the
- deposition of Nenita "Baby" Lopez which was held and audio/video recorded in Manila, by
- counsel for Defendant, Colin Thompson. I also made an audio tape recording of the telephonic
- proceedings from my office.
5. My office staff has informed me that they made inquiry with Attorney Thompson's

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1 office staff this morning and were informed that the transcript of Ms. Lopez's deposition has
2 not yet been received and/or completed.

3 6. The extended filing deadline for Plaintiffs' Opposition to Defendant's Motion for
4 Summary Judgment is today, September 29, 2006 at 3:30p.m.

5 7. So as to not cause delay and hopefully to expedite matters, counsel has included in
6 Plaintiffs' Verified/Amended Opposition references and citations to the deposition of Ms. Lopez
7 with the page and line numbers in blank, to be filled in by errata/supplementation including
8 references to exhibits upon receipt of the transcript, for which counsel hereby request and seek
9 leave of court.

10 8. Because of lack of work and personal reasons plaintiff Mercia Quipot I am informed has
11 moved and resides in New Zealand. I have made a diligent effort to contact her or determine
12 her address or location without success. Counsel believes that given timewe will likely to be
13 able to contact or she may contract counsel prior to the October 16, 2006 trial date and thereof
14 request the court in the exercise of its sound discretion to grant said plaintiff additional and
15 reasonable time to comply and file her affidavit as may appear proper.

16 9. Plaintiffs Marichu Navida and Helen Cruz are in the Philippines and our office is
17 awaiting receipt of their signed declaration. Upon receipt my office will file and serve counsel
18 for defendant promptly.

19 10. Similarly, Plaintiff Haide Correa is in Alaska and we are awaiting receipt of her signed
20 declaration and will likewise file and serve it upon receipt.

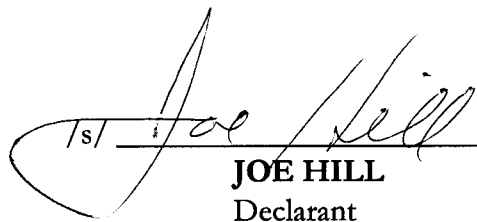
21 11. The Court in the sound exercise of its discretion is therefore asked to grant the subject
22 plaintiffs appropriate time to comply and file any document that may so required by the Court.

23 12. I attained from the CNMI DOL Hearing Office a certified copy of the Notice of
24 Violation; Unauthorized Employment: wrongful termination of contract n CAC No. 05-100-05
25 & CAC NO. 05-101-06 and from the DOL a certified copy of the DOL contract form used in

1 this matter.

2 I declare under the penalty of perjury that the foregoing is true to the best of
3 my knowledge and belief.

4 Dated this 29th day of September, 2006.

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7  /s/ **JOE HILL**
8 Declarant
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